

Memorandum

To : Ron Helgeson

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Intergovernmental Review-Headquarters

From : Tom Meyers
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Intergovernmental Review
District 9 - Bishop

Subject : Comments on the U. S. Department of Energy Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada

District 9 staff have reviewed the transportation-related portions of the Draft Environmental Impact Statement (DEIS), and present the following comments for inclusion in comments presented on behalf of Caltrans and the State of California.

1. The routing analysis presented in the DEIS assumes two bounding cases for modal mix: mostly legal-weight trucks, and mostly rail. The analysis does not attempt to select truck routes, but uses current routing regulations to route shipments and analyze impacts. As current routing regulations and practices use the interstate system, the analysis does not consider the use of routes designed, built and maintained to lower standards than the interstate system. Impacts to routes outside of Nevada other than the interstate system have not been addressed in this DEIS. Should truck routes outside of Nevada other than the interstate system be selected for use in the future, an additional review will be required to assess the potential impacts. There is also no proposal to use California as a corridor for radioactive waste shipments through the State, except for shipments from our northern neighbors. We recommend that the State go on record against any additional through shipments (besides those from Oregon and Washington States). Specifically, there have been some discussions about using State Routes 40 and 127 to bypass the Las Vegas Valley for low-level shipments. The concern is that these proposals could create a precedent for high-level shipments due to concern from the State of Nevada and the local governments and populace in the Las Vegas area. Highway 127 is a secondary, class III highway and significant study and improvements would be necessary before any consideration of its use is made. Additionally, there is considerable political pressure to avoid re-routing into California radioactive waste shipments from the East bound for the Nevada Test Site. Senators Boxer and Feinstein, and Congressmen Farr and Lewis have written opposing the diversion of these shipments into California. The issue has become politically sensitive, with local governments in California and Nevada on record as opposed to shipments through their areas. Any change to the current proposed routing within California would require a complete environmental review similar to the one currently taking

place, including the preparation of the appropriate environmental documents. However, the use of RADTRAN for the estimation of potential radiological exposures is not appropriate on State Routes, without significant adjustments.

2. The DEIS rail analysis assumes ultimate delivery to the proposed repository will either be by a rail line yet to be constructed within the state of Nevada, or by heavy-haul routes exclusively within the state of Nevada. However, the Department of Energy has been examining the use of intermodal (rail to truck) routes outside of Nevada for shipments of radioactive waste to the Nevada Test Site, immediately adjacent to Yucca Mountain. The DEIS fails to examine potential impacts to heavy-haul routes that would be used to transport spent nuclear fuel and high-level radioactive waste from the intermodal terminal to Yucca Mountain, should an intermodal terminal be selected that utilizes routes outside of Nevada. Should this occur, this DEIS will not have addressed the potential impacts, and additional environmental review will be required.
3. Even if the routing assumptions contained in the DEIS are correct, California will experience a significant number of shipments. In addition to shipments originating within California, shipments from Oregon and Washington will travel along routes in California. The recommendations contained in the memorandum from Alan R. Mill dated December 6, 1999 should be included as a part of the comments submitted by Caltrans. Caltrans should take an active part in continuing discussions with the Department of Energy concerning routing, emergency response training and funding, and the development of monitoring and response capabilities along the selected routes. The work done in preparation for shipments to the Department of Energy's Waste Isolation Pilot Plant in New Mexico, spearheaded in California by the California Energy Commission through the Western Governors Association, provides a good example to follow.
4. In addition to shipments from commercial reactors, the shipments from the northwest will include shipments of high-level radioactive waste from the Department of Energy's facilities at Hanford. The number of shipments from this facility are highly dependant on volume reduction strategies implemented prior to the conversion of the waste into glass in canisters. These waste reduction strategies are being reconsidered due to budget constraints at the Hanford facility. California should strongly support the use of volume reduction strategies at Hanford to reduce the number of shipments from this facility along California highways.

cc: Thomas P. Hallenbeck